

## **REMARKS**

Claims 1-23 are pending in the present application. By this amendment, claims 1, 2, 4, 11, and 20 are amended. Applicants respectfully request reconsideration of the present claims in view of the foregoing amendments and the following remarks.

### **I. Claim Rejections**

#### **Claim Rejections Under 35 U.S.C. §103(a)**

Claims 1-23 are rejected under 35 U.S.C. §103(a) as being unpatentable over United States Application Publication No. 2002/0194388 to Boloker et al. (hereinafter "Boloker") in view of United States Application Publication No. 2002/0087596 to Lewontin. Applicants respectfully traverse this rejection.

As amended, claim 1 recites a Wireless Application Protocol (WAP) system for delivering voice-based content to a user of a wireless device. The WAP Server is operative to: receive a voice-based content request from the wireless device; and send instructions to a Voice Portal Node to establish a connection between the wireless device and the Voice Portal Node, in response to receiving the voice-based content request. The Voice Portal Node comprises an out-bound dialing module operative to initiate a wireless telephone call to the wireless device, in response to receiving the instructions from the WAP server, to establish a connection between the wireless device and the Voice Portal Node. The WAP Server is further operative to provide the voice-based content to the wireless device over the connection. Support for this amendment may be found on page 3, lines 16-26 of the Specification.

Boloker does not teach, suggest, or describe each of the features specified in amended claim 1. For example, Boloker fails to describe a Voice Portal Node comprising an out-bound dialing module operative to initiate a wireless telephone call to the wireless device in response to receiving the instructions from the WAP server, to establish a connection between the wireless device and the Voice Portal Node. On the contrary, the alleged Voice Portal Node described in the Office Action as element 213 of Figure 24 is actually a speech application server comprising a speech browser, a DOM interface, conversational engines, and a communication stack. The distributed WAP

system of Figure 24 provides, among other features, support of Voice over Data (GPRS) or conversational coding and protocols (for data only connections). See Par. 0396. This is not analogous to the system recited by claim 1 because Boloker fails to teach, suggest, or describe a Voice Portal Node comprising an out-bound dialing module operative to initiate a wireless telephone call. Instead, Boloker describes that a WAP phone can communicate with the speech application server and the server through a wireless gateway using a data protocol (GPRS) or over data only connections. Thus, Boloker does not describe initiating a voice connection. Lewontin, relied upon in the Office Action to cure the deficiencies of Boloker, describes a wireless network infrastructure but fails to teach, suggest, or describe a Voice Portal Node comprising an out-bound dialing module operative to initiate a wireless telephone call to a wireless device in response to receiving instructions from a WAP server, to establish a connection between the wireless device and the Voice Portal Node.

For at least the reasons given above, Applicants respectfully submit that claim 1 is allowable over Boloker in view of Lewontin. Since claims 2-10 and 21-22 depend from claim 1 and recite further claim features, the claims are also allowable for at least these reasons. Amended independent claims 11 and 20 recite similar features as amended independent claim 1 and are thus allowable over Boloker in view of Lewontin for at least the same reasons. Claims 12-19 and 23 depend from claim 11 and recite further claim features. Therefore, these claims are also allowable for at least these reasons. Thus, it is respectfully submitted that the rejection of claims 1-23 should be withdrawn.

### **CONCLUSION**

For at least these reasons, Applicant asserts that the pending claims 1-23 are in condition for allowance. The Applicants further assert that this response addresses each

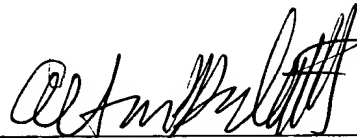
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Amdt. dated December 20, 2005  
Reply to Office Action of August 23, 2005

and every point of the Office Action, and respectfully request that the Examiner pass this application with claims 1-23 to allowance. Should the Examiner have any questions, please contact Applicants' attorney at 404.954.5035.

Respectfully submitted,

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Date: December 20, 2005



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